



FAVERO GEOSCIENCES

1210 South 5<sup>th</sup> Street  
Springfield, IL 62703  
Phone 217.522.6714  
Fax 217.522.6727  
dfavero@ameritech.net

July 14, 2011

Mr. Don Heller  
U.S. Environmental Protection Agency, Region 5  
Waste Management Division  
77 West Jackson Blvd., HRP-8J  
Chicago, IL 60604-3590

RE: Second Quarter 2011 Progress Report  
RCRA Corrective Action  
Allison Transmission, Speedway, IN  
USEPA ID Nos. IND006413348 and IND000806828

Dear Mr. Heller:

The attached progress report is submitted on behalf of General Motors LLC (GM), in accordance with the requirements of the Performance-Based Corrective Action Agreement between the U.S. Environmental Protection Agency Region 5 (USEPA) and General Motors Corporation. The progress report covers the second quarter of 2011 (April 1, 2011 through June 30, 2011).

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,

David M. Favero, P.G.  
Project Manager

Attachment A – Second Quarter 2011 Progress Report

C: Glynda Oakes, IDEM Office of Land Quality (via e-mail)  
Adam Rickert/Pam Thevenow, Marion County Health Department (via e-mail)  
Marilyn Dedyne/Jean Caufield, GM (paper & via e-mail)  
Kim Crame/Sue Barto, Allison Transmission, Inc. (via e-mail)  
Speedway Library (Public Information Repository) (paper)

ref: c:\proj\gmtatd\rcracorrectiveaction\qtrlyreports\2qtr2011report\_2011Apr\_Allison\_final

ATTACHMENT A  
SECOND QUARTER 2011 PROGRESS REPORT  
PERFORMANCE-BASED RCRA CORRECTIVE ACTION  
ALLISON TRANSMISSION  
APRIL 1, 2011 TO JUNE 30, 2011

WORK PERFORMED THIS QUARTER

- Completed and submitted *First Quarter 2011 Progress Report*, RCRA Corrective Action, Allison Transmission, Speedway, IN, USEPA ID Nos. IND006413348 and IND000806828.
- Finalized and submitted to USEPA on May 2, 2011, the *Former Plant 2 Engineering Control Completion Report*, RCRA Corrective Action, Allison Transmission, Speedway, IN, USEPA ID Nos. IND006413348 and IND000806828.
- Finalized and submitted to USEPA on May 19, 2011, a work plan for implementing a soil vapor extraction system at AOI 42/43 (Plant 14) and for supplementing the SVE system at Plant 12.
- Prepared and submitted to USEPA on May 26, 2011, *RCRA Corrective Action, Proposed Monitoring Well Locations South of Plant 12, GM LLC at Allison Transmission, Inc., Speedway, Indiana*.
- Completed installation of monitoring wells south of Plant 12 and submitted preliminary draft data to USEPA on June 15, 2011.
- Continued operation and maintenance of interim measures: soil vapor extraction (SVE)/groundwater recovery system at the Plant 12 Former Degreaser Area (AOI 51), passive free product recovery and groundwater recovery related to the diesel fuel impacted groundwater plume (AOI 40), total fluids recovery at the waste treatment area (AOI 19), and passive free product recovery at the Transmission Test Assembly Area (AOI 53).

DATA AVAILABLE DURING THIS QUARTER

- Analytical results from monitoring air emissions from the Plant 12 former degreaser area SVE and air stripper exhaust stacks (to be included in the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report*, First Half 2011).
- Analytical results from monitoring the effluent from the pretreatment of recovered groundwater from the diesel fuel plume (Outfall 003), and effluent from the treatment of recovered groundwater from the Plant 12 Former Degreaser Area (Outfall 004), (to be

included in the *RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report*, First Half 2011).

- Preliminary analytical results from groundwater monitoring south of Plant 12 as outlined in the memo *RCRA Corrective Action, Proposed Monitoring Well Locations South of Plant 12, GM LLC at Allison Transmission, Inc., Speedway, Indiana* (to be included in update to *Evaluation of Chlorinated Volatile Organic Compounds South of Allison Transmission Plant 12*).

#### PROBLEMS ENCOUNTERED

- None.

#### SUMMARY OF PROBLEM RESOLUTION

- NA

#### POTENTIAL PROBLEMS

- None.

#### ESTIMATED PERCENT COMPLETE FOR SELECTED ACTIVITIES

- |  |      |
|--|------|
| • DOCC   | 100% |
| • Public Participation Plan                          | 100% |
| • RFI Work Plan                                      | 100% |
| • RFI Phase I Implementation                         | 100% |
| • RFI Data Report (through Phase I data)             | 100% |
| • RFI Phase II Implementation                        | 100% |
| • RFI Data Report (updated to include Phase II data) | 100% |
| • RFI Phase III Implementation                       | 100% |

- Plant 12 Former Degreaser Area (AOI 51)  
Downgradient Groundwater Migration Control  
Interim Measures Work Plan 100%
- Plant 12 Former Degreaser Area (AOI 51)  
Downgradient Groundwater Migration Control  
Interim Measures Implementation 100%
- AOI 19 Interim Measures Work Plan 100%
- AOI 19 Interim Measures Implementation 100%
- Draft RFI Report 100%
- Final RFI Report 100%  
(Submitted February 20, 2009)
- Environmental Indicator Human Health 100%
  - CA725 Determination (Due by March 31, 2008 and Submitted on March 28, 2008); Resubmitted on July 1, 2008 and approved by USEPA on September 25, 2008.
- Environmental Indicator Groundwater Migration 100%
  - CA750 Determination (Due by March 31, 2008 and Submitted on March 28, 2008)
- Sampling to Support Corrective Measures  
Proposal and Confirm RFI Results 100%
- Data Report for Additional Sampling 100%
- AOI 2-1 Interim Measures Work Plan 100%  
(Approved by USEPA on November 6, 2008)
- AOI 2-1 Interim Measures Implementation 100%
- Stage II Additional Sampling to Support the Corrective  
Measures Proposal and to Support Evaluation of Interim  
Measures System Performance 100%
- Data Report For Stage II Additional Sampling 100%  
(Submitted March 27, 2009)



- Stage III Sampling Matrix (Submitted June 19, 2009) 100%
- Stage III Additional Sampling Implementation 100%
- Data Report For Stage III Additional Sampling 100%
- Corrective Measures Proposal (Revised due date; March 31, 2009; Submitted March 31, 2009) 100%
- Interim Measures for AOIs 42 & 43 (Plant 14) and Supplementing the SVE system at Plant 12 10%
  - Work Plan Submitted to USEPA (May 19, 2011)
  - USEPA Approved Work Plan (May 23, 2011)
  - Wells Installed (TBD)
- Operation, Monitoring and Maintenance of Interim Measures  
[Note that the estimated percent complete for these interim measures are only intended to be rough approximations and are subject to revision based on review of monitoring data. Discontinuing operation of any of these interim measures will be coordinated with USEPA and will be based on a review of monitoring data and evaluation of appropriate risk-based end points, if applicable.]
  - Plant 12 PCE Soil Vapor Extraction System 57%
  - Plant 12 PCE Groundwater Recovery System 13%
  - Plant 12 Transmission Test Assembly Area 81%
  - Diesel Fuel Plume Recovery System 62%
  - Waste Treatment LNAPL Recovery System 30%

#### SUMMARY OF CONTACTS WITH INTERESTED PARTIES

- Provided the following documents to the public information repository this quarter:
  - *First Quarter 2011 Progress Report*, RCRA Corrective Action, Allison Transmission, Inc., Speedway, IN, USEPA ID Nos. IND000806836 and IND094469913, April 14, 2011.
  - *Former Plant 2 Engineering Control Completion Report*, RCRA Corrective Action, Allison Transmission, Speedway, IN, USEPA ID Nos. IND006413348 and IND000806828, May 2, 2011.

- *Soil Vapor Extraction (SVE) Interim Measures Work Plan, Plant 14 Former Degreaser Area (AOIs 42 & 43) and Plant 12 Former Degreaser Area (AOI 51), RCRA Corrective Action, Allison Transmission, Speedway, IN, USEPA ID Nos. IND000806836 and IND094469913, May 19, 2011.*
- *RCRA Corrective Action, Proposed Monitoring Well Locations South of Plant 12, GM LLC at Allison Transmission, Inc., Speedway, Indiana, May 26, 2011.*

#### CHANGES IN PERSONNEL

- None.

#### PROJECTED WORK FOR NEXT REPORTING PERIOD

- Continue implementing the Interim Measures Work Plan for a soil vapor extraction system at AOI 42/43 (Plant 14) and for supplementing the SVE system at Plant 12.
- Coordinate with USEPA, as necessary, in relation to the Statement of Basis for Plant 2.
- Prepare responses, summaries of meetings, data reviews, or other conference calls with USEPA, as appropriate.
- Perform routine operation, monitoring and maintenance for operating remediation systems and implement duplicate high level alarms at remediation systems.

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